

FILED  
IN CLERKS OFFICE

2022 JUN -6 PM 12:32

U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Eastern Division

Case No. 1:22-cv-10473

MICHAEL BUSH

*Plaintiff*

VS.

THE WANG CENTER FOR THE  
PERFORMING ARTS, INC. d/b/a Boch Center  
*Defendant*

**PLAINTIFF'S MOTION TO COMPEL INITIAL  
DISCLOSURES, RULE 26(f) CONFERENCE, DISCOVERY, AND  
COMPLIANCE WITH LOCAL R. CIV. P. 7.1(a)(2)**

Plaintiff hereby moves to compel the Defendant to provide initial disclosures, engage in the requisite Fed. R. Civ. P. 26(f) conference, respond to discovery requests, and comply with Local R. Civ. P. 7.1(a)(2). In support of this motion the Plaintiff encloses a memorandum of reasons.

June 4, 2022

Respectfully submitted,

Michael Bush, Pro Se  
Michael Bush  
280 Lowell Street  
Carlisle MA 01741  
*Bmoc54@verizon.net*

Phone: (978) 734-3323

**LOCAL RULE 7.1 CERTIFICATE**

I hereby certify, pursuant to Local Rule 7.1(a)(2), that on June 3, 2022, I requested via email to schedule a telephone conference with the Defendant's counsel in an effort to resolve or narrow the issues regarding this motion. The Defendant's counsel replied via email that same day and refused to engage in such a conference. That email exchange is enclosed as Exhibit 1.

Michael Bush, Pro Se  
Michael Bush

**CERTIFICATE OF SERVICE**

I, Michael Bush, hereby certify that I have, on this 4<sup>th</sup> day of June, 2022, served a copy by mail of the foregoing and any accompanying document(s) pursuant to Fed. Rule Civ. Proc. 5(b)(2) and Local Rule 5.2 upon the following:

Bruce E. Falby & Kelsey Tavares  
DLA Piper LLP (US)  
33 Arch Street  
26th Floor  
Boston MA 02110-1447

Michael Bush, Pro Se  
Michael Bush